

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-89-E

In the Matter of:

Application of Duke Energy Carolinas,
LLC for Approval of Rider 11,
Demand-Side Management and Energy
Efficiency for 2020

PETITION TO INTERVENE

Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) (collectively, “Petitioners”) hereby petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On March 1, 2019, Duke Energy Carolinas, LLC (“DEC”) filed an application for approval of its DSM and EE cost recovery and incentive rider for 2020 (“Rider 11”). The proposed Rider 11 consists of components calculated under DEC’s “save-a-watt” cost recovery and incentive mechanism approved in Docket No. 2009-226-E, as well as under DEC’s new cost recovery and incentive mechanism approved in Docket No. 2013-298-E.

2. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

3. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. CCL advocates for energy efficiency and supports the development of energy policy that is in the public interest of South Carolinians. The principal address of CCL is Post Office Box 1765, Charleston, South Carolina, 29402.

4. Petitioners and their members have a direct and substantial interest in this proceeding. Petitioners have members who are customers of DEC and are therefore subject to the direct impacts of DEC's DSM/EE rider. Petitioners and their members are interested in promoting greater reliance on DSM and EE resources to meet South Carolina's energy needs.

5. Petitioners participated actively in and were parties to the stipulations of settlement reached in Docket Nos. 2009-226-E and 2013-298-E, and also participated actively in the past eight annual DSM/EE rider proceedings, Docket Nos. 2018-72-E, 2017-65-E, 2016-92-E, 2015-89-E, 2014-334-E, 2013-299-E, 2012-303-E, and 2011-420-E.

6. Petitioners seek to intervene in this proceeding in order to ensure that their members' interests in promoting energy savings through cost-effective DSM and EE are represented. Petitioners are also interested in ensuring that DEC's DSM and EE programs are delivering results, and that the costs and incentives to be recovered via the rider are based on measured and verified energy savings.

7. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this docket.

Respectfully submitted this 30th day of April, 2019.

s/ Stinson W. Ferguson
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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail at the addresses set forth below:

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This the 30th day of April, 2019.

s/ Stinson W. Ferguson